## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (FM) ECF Case
---	------------------------------------

This document relates to:

Federal Insurance Co., et al. v. al Qaida, et al., Case No. 03-CV-06978 Ashton et al. v. al Qaeda Islamic Army, et al., Case No. 02-CV-06977

## FEDERAL INSURANCE AND ASHTON PLAINTIFFS' JOINT MOTION TO PROCEED UNDER 28 U.S.C. § 1605A AS AGAINST DEFENDANT, THE ISLAMIC REPUBLIC OF IRAN

PLEASE TAKE NOTICE that upon the supporting Memorandum of Law and exhibits thereto, the *Federal Insurance* Plaintiffs, by and through their counsel, Cozen O'Connor, and the *Ashton* Plaintiffs, by and through their counsel, Kreindler & Kreindler, LLP, will move the Court before the Honorable George B. Daniels, at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10007, at a date and time to be determined by the Court, for an Order granting Plaintiffs' motion to amend their complaint solely as against the Islamic Republic of Iran ("Iran"), to proceed under 28 U.S.C. § 1605A, and confirming that service of the amended complaint on Iran is not required.

Respectfully submitted, COZEN O'CONNOR

BY: /s/
Stephen A. Cozen, Esquire
Elliott R. Feldman, Esquire
Sean P. Carter, Esquire
J. Scott Tarbutton, Esquire

J. Scott Tarbutton, Esquire 1650 Market Street Philadelphia, PA 19103

Tel: (215) 665-2000

Attorneys for Federal Insurance Plaintiffs

KREINDLER	& KREINDLI	ER, LLP
-----------	------------	---------

BY: /s/
James P. Kreindler, Esquire
Andrew J. Maloney, III, Esquire
750 Third Avenue, 32<sup>nd</sup> Floor
New York, New York 10017
Tel: (212) 687-8181

Attorneys for Ashton Plaintiffs

LEGAL\20171170\1